

Page Denied

OGC/LEGL Review Completed.

(b)(2)
(b)(3)

ROBERT A. SMITH 1561
Attorney at Law, A Law Corporation
Grosvenor Center, PRI Tower
733 Bishop Street, Suite 2635
Honolulu, Hawaii 96813
Telephone (808) 523-6411

Of Counsel:

MELVIN M. BELLI, SR.
MELVIN CEASAR BELLI, JR.
PAUL M. MONZIONE
The Belli Building
722 Montgomery Street
San Francisco, California 94111
Telephone (415) 981-1849

RODNEY A. KLEIN, ESQ.
Law Offices of Rodney A. Klein
2300 Bell Executive Lane
Sacramento, California 95825
Telephone (916) 929-8424

Attorneys for Plaintiffs

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

APR 27 1984

at 4 o'clock and 0 min. M.
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

LOUIS THEODORE FRIGARD and)
MIRIAM CLAUDIA FRIGARD,)
Plaintiff,)
v.)

CIVIL NO. 84-0419

COMPLAINT; SUMMONS

THE UNITED STATES OF)
AMERICA, (USA), and THE)
CENTRAL INTELLIGENCE AGENCY,)
(CIA), a U.S. Governmental)
Agency,)
Defendants.)

COMPLAINT

Plaintiffs allege:

A. Background

1. This is a suit against the United States of
America under the Federal Tort Claims Act, 28 U.S.C. §2671; and

(b)(2)
(b)(3)

ATTEST: WALTER A. Y. H. CHINN
Clerk, United States District
Court, District of Hawaii

this Court has jurisdiction pursuant to 28 U.S.C. §§1346(b).

2. Plaintiffs are Hawaii residents and investors in Bishop, Baldwin, Rewald, Dillingham & Wong, Inc. ("Bishop Baldwin"), a Hawaii corporation of which Ronald Ray Rewald ("Rewald") was and is chairman of the board of directors. Bishop Baldwin has been adjudicated bankrupt. Appeal from that adjudication is pending.

2. The Central Intelligence Agency (hereinafter "Agency" or "CIA") is an agency of defendant USA, within the meaning of 28 U.S.C. §2671, for whose tortious conduct or the tortious conduct of its agents and representatives, who are investigative or law enforcement officers within the meaning of 28 U.S.C. §2680(h), defendant has liability pursuant to 28 U.S.C. §2674.

3. The factual allegations hereinafter set forth are of facts as reported in the public media or as previously stated publicly by others. As to the truth of those facts, Rewald will submit a sworn statement under seal, as may be required.

4. At all times pertinent hereto, Rewald was a covert agent of the CIA. Rewald, acting pursuant to directions of the CIA, established in Honolulu in 1977 and 1978 two cover operations for the Agency, named H & H Enterprises and Canadian Far East Trade Corp. Additionally, the Agency took over use of CMI Investment Corp., a Wisconsin company which Rewald brought with him to Hawaii as a business vehicle. Also at Agency

direction, Rewald, together with others then involved, established another firm which would specialize in the Far East and Southeast Asia. This was Bishop, Baldwin, Rewald, Dillingham & Wong. Bishop Baldwin grew, establishing offices in foreign countries, many under CIA direction. The Agency established an operating budget for Bishop Baldwin of several million dollars; and the Agency used Bishop Baldwin checking accounts and reimbursed Bishop Baldwin and its agents and employees their expenses for Agency work.

5. The Agency and its representatives began to use the Bishop Baldwin investment account and other investments to shelter monies of highly placed foreigners and for the CIA's own use. Bishop Baldwin's main depository account consisted of (1) funds from legitimate investors; (2) funds from the CIA; and (3) cover funds from highly placed foreigners. These funds were co-mingled in the Bishop Baldwin investment account and used in (a) meeting Bishop Baldwin overhead, (b) legitimate Bishop Baldwin investment transactions in which the CIA had no interest, and (c) CIA-directed projects. The CIA put money into Bishop Baldwin and directed Bishop Baldwin in the use of such CIA funds. The CIA knew that its funds were co-mingled with the funds of Bishop Baldwin and its clients. The CIA also knew the manner in which Bishop Baldwin raised and obtained funds from legitimate investors and knew what representations were made by Bishop Baldwin to legitimate investors to induce them to invest their funds.

6. The necessity for the filing of this complaint stems from an Internal Revenue Service investigation into Bishop Baldwin and Rewald which was underway by the Fall of 1982 and from investigative activity into the affairs of Bishop Baldwin which was publicly disclosed in a television broadcast on July 29 of this year. The television broadcast disclosed that Rewald had undergone a previous bankruptcy and disclosed that there were pending investigations into Bishop Baldwin by the State of Hawaii Department of Commerce and Consumer Affairs and the Federal Deposit Insurance Corporation. Reacting to the public humiliation and embarrassment, Rewald attempted suicide. Within days, he had been arrested on two state charges of "theft by deception," the key "complainant" being former Honolulu head of station John C. Kindschi who on July 29--the very day of the broadcast and the attempted suicide--requested (and the next day received) \$140,000 from Bishop Baldwin. (Kindschi had retired from the CIA as station chief and was a full-time paid Bishop Baldwin consultant and a member of the board of directors). Certain Bishop Baldwin investors, panicking, filed a petition to place Bishop Baldwin in involuntary bankruptcy. Simultaneously, the Securities and Exchange Commission filed fraud charges. Both the bankruptcy trustee and the SEC obtained court injunctions "freezing" Rewald's personal assets. Thus within a matter of days following the July 29 news broadcast, Bishop Baldwin was in bankruptcy; and Rewald was jailed at the instance of the

Honolulu Police Department and the Public Prosecutor for the City and County of Honolulu. Thereafter Rewald was held in prison in lieu of \$10 million dollars bail.

7. Despite Rewald's efforts to resist the involuntary petition, the trustee has reported to investors that Bishop Baldwin has virtually no recoverable assets; its assets have been denigrated and its business disparaged; and Bishop Baldwin has been adjudicated insolvent and bankrupt. Although an appeal from that adjudication is pending, Bishop Baldwin has been effectively destroyed as a thriving company and going concern.

8. The claims made herein are based on the Agency's knowledge and participation with Rewald and Bishop Baldwin in Agency activities. Certain of the claims set forth in this complaint may sound in tort. Plaintiffs are entitled, if they so elect, to waive their basic tort claims and sue in assumpsit, so that such claims can be pursued not under the Federal Tort Claims Act but rather under the Tucker Act, 28 U.S.C. §§1346(a)(2) and 1491.

FIRST CAUSE OF ACTION
(Negligence)

9. Plaintiffs repeat and reallege paragraphs 1 through 8, inclusive, of this complaint and make them a part of the instant cause of action as though fully set forth.

10. At all times relevant hereto, in all of the acts of the USA and the CIA as herein alleged, the CIA acted in a

manner which was grossly negligent in that the CIA neither supervised nor cared about the aforementioned investors which the CIA trapped into bogus investments, and not only mulcted the plaintiffs and other investors, but brought disrespect and dishonor on the United States Government and on one of its agencies. Additionally, said agency passed on its accoutrements and conspired to bring dishonor and calamity to plaintiffs as citizens of the United States and to other U.S. Citizens, thereby causing damages to plaintiffs as hereinafter alleged.

11. At all times herein alleged, defendant, CIA so negligently maintained, controlled, ran, operated, supervised, funded, counseled, and managed the investment firm of Bishop, Baldwin, Rewald, Dillingham & Wong, Inc. (hereinafter "BBRDW"), so as to cause certain of its investors to file bankruptcy thereby causing the collapse of BBRDW and of its chairman of the board, Rewald, thereby actually and proximately causing plaintiffs' damages as herein alleged.

12. As a direct and proximate result of the negligent acts of defendants, and each of them, plaintiffs lost considerable assets and investment monies and interest thereon, and have suffered and in the future will continue to suffer economic losses including, but not limited to, the loss of plaintiffs' personal and real properties, all in an amount to be proven at time of trial, but in no event in an amount less than \$2 million dollars.

13. As a further direct and proximate result of the negligent acts of defendants, and each of them, plaintiffs have suffered embarrassment, humiliation, severe and great emotional pain and suffering, and emotional distress, fear, anger, chagrin, anxiety, and disappointment, all to their general damage in an amount to be proven at time of trial, but in no event less than \$1 million dollars.

SECOND CAUSE OF ACTION
(Negligent Entrustment)

14. Plaintiffs repeat and reallege paragraphs 1 through 11, and make them a part of the instant cause of action as though fully set forth .

15. At all times herein alleged, defendants, and each of them, negligently entrusted the management, operation, control, supervision, and counseling, of BBRDW to individuals who, defendants knew, or in the exercise of reasonable care, should have known, were unfit and unqualified, and otherwise incapable of such tasks under the circumstances as hereinabove described.

16. As a direct and proximate result of the negligent entrustment of defendants, and each of them, plaintiffs lost considerable assets and investment monies and interest thereon, and have suffered and in the future will continue to suffer economic losses including, but not limited to, the loss of plaintiffs' personal and real properties, all in an amount to

be proven at time of trial, but in no event in an amount less than \$2 million dollars.

17. As a further direct and proximate result of the negligent acts of defendants, and each of them, plaintiffs have suffered embarrassment, humiliation, severe and great emotional pain and suffering, and emotional distress, fear, anger, chagrin, anxiety, and dissatisfaction, all to their general damage in an amount to be proven at time of trial, but in no event less than \$1 million dollars.

THIRD CAUSE OF ACTION
(Accounting)

18. Plaintiffs repeat and reallege paragraphs 1 through 11, and make them a part of the instant cause of action as though fully set forth.

19. BBRDW, by and because of the activities of Rewald, made huge and substantial profits in the sale of military supplies and other commodities to foreign countries which said profits the defendant, CIA, has sequestered. BBRDW also made other substantial profits from various business dealings and transactions, all of which profits were made for the benefit of its investors, including plaintiffs, and plaintiffs demand a share thereof for themselves and BBRDW, and a full and complete detailed accounting of same.

FOURTH CAUSE OF ACTION
(Negligent Misrepresentation)

20. Plaintiffs repeat and reallege paragraphs 1 through 11, and make them a part of the instant cause of action as though fully set forth.

21. At all times herein alleged, defendants, and each of them, through various of their agents and representatives made certain misrepresentations to plaintiffs that plaintiffs would receive a substantial return on their investments with BBRDW, and that the investment firm of BBRDW was a legitimate, reputable, qualified investment firm.

22. Defendants, and each of them, were negligent in making the aforementioned misrepresentations in that in the exercise of reasonable care and through information available to them, defendants should have known BBRDW was not a legitimate investment firm, but rather was a covert operation run by the CIA as herein alleged.

23. In fact, defendant, CIA set up BBRDW as a college of art and deception and as a counterpart for this sordid espionage system that all of today's world governments have degenerated into. If the CIA is not stopped by an American jury from continuing such sordid and Machiavellian activities, it will inveigle other blameless world investors into such schemes, and precipitate world conflicts and violence in the family of nations.

24. That as part of the misrepresentations of defendants, and each of them, Rewald was instructed and encouraged by the CIA to live an opulent lifestyle and in a manner which has been described by some as outlandish, extravagant, and "high on the hog," which was part of the deception of the CIA to make plaintiffs and other investors, and foreign countries think that BBRDW was an honest, innocuous, straightforward, American, commercial business company. As in truth in fact, BBRDW was a dirty, deceptive, duplicitous front for a malevolent espionage agency.

25. Defendant, CIA, with malice aforethought and duplicitous intent has deceived and lied to the press and communication public services all over the world saying that Rewald was not their secret, CIA agent, and secondly, saying they knew nothing of BBRDW, when the truth in fact is that the defendant, CIA now admits that said Rewald was their secret, covert, espionage agent with wide authority all over the world, and released that Rewald signed a secret oath not to divulge his connection with the CIA which set up BBRDW.

26. Defendant, CIA has violated and abandoned their part of said oath, if any there were, by denying the existence of the relationship between Rewald and the CIA as more fully herein appears.

27. Defendant, CIA at all times herein alleged, was acting illegally under the laws of the constitution of the United States in such domestic espionage and covert activities domestically.

28. That not only were said misrepresentations negligently made, but that said defendant, CIA has deliberately lied to the plaintiff as to its connection and activities with said Oswald, and has also prevaricated and falsified their activities to the U.S. Congress and other agencies of the U.S. Government.

29. As a direct and proximate result of the negligent misrepresentations of the defendants, and each of them, plaintiffs lost considerable assets and investment monies and interest thereon, and have suffered and in the future will continue to suffer economic losses including, but not limited to, the loss of plaintiffs' personal and real properties, all in an amount to be proven at time of trial, but in no event in an amount less than \$2 million dollars.

30. As a further direct and proximate result of the negligent acts of defendants, and each of them, plaintiffs have suffered embarrassment, humiliation, severe and great emotional pain and suffering, and emotional distress, fear, anger, chagrin, anxiety, and disappointment, all to their general damage in an amount to be proven at time of trial, but in no event less than \$1 million dollars.

FIFTH CAUSE OF ACTION

(Breach of Expressed and Implied Contract)

31. Plaintiffs repeat and reallege paragraphs 1 through 11, and make them a part of the instant cause of action as though fully set forth.

32. On or about February 9, 1983, plaintiffs and defendant, CIA through its agents and representatives, entered into an express and or implied contract wherein the defendants promised in exchange for plaintiffs' investments to return a certain percentage of profit to plaintiffs on said investments, and to invest plaintiffs' money legitimately, legally, prudently, and with good business judgment.

33. Plaintiffs have performed all acts on their part to be performed under the terms of the aforementioned express and/or implied contract.

34. In or about the month of August, 1983, defendants, and each of them breached the aforementioned express and/or implied contract in that defendants refused and continue to refuse to return plaintiffs' investment or any part thereof or interest thereon, although plaintiffs have demanded and continue to demand the return of same. Additionally, said defendants further breached the aforementioned contract by failing in their duty to legally, legitimately, prudently, and with reasonable business judgment invest said sums and to return interest and profit on said investment as provided for in the contract and as hereinabove alleged.

35. As a direct and proximate result of the breach of contract by defendants, and each of them, plaintiffs have lost considerable assets and investment monies and interest thereon, and have suffered and in the future will continue to suffer economic losses including, but not limited to, the loss of plaintiffs' personal and real properties, all in an amount to be proven at time of trial, but in no event in an amount less than \$2 million dollars.

36. As a further direct and proximate result of the breach of contract acts of defendants, and each of them, plaintiffs have suffered embarrassment, humiliation, severe and great emotional pain and suffering, and emotional distress, fear, anger, chagrin, anxiety, and dissatisfaction, all to their general damage in an amount to be proven at time of trial, but in no event less than \$1 million dollars.

SIXTH CAUSE OF ACTION
(Negligent Infliction of Emotional Distress)

37. Plaintiffs repeat and reallege paragraphs 1 through 11, and paragraphs 21 through 28, and make them a part of the instant cause of action as though fully set forth.

38. At all times herein alleged, defendants, and each of them, acted in a manner which was so grossly negligent that plaintiffs were injured as herein alleged.

39. As a direct and proximate result of the negligent infliction of emotional distress, plaintiffs have lost considerable assets and investment monies and interest thereon, and have suffered and in the future will continue to suffer economic losses including, but not limited to, the loss of plaintiffs' personal and real properties, all in an amount to be proven at time of trial, but in no event in an amount less than \$2 million dollars.

36. As a further direct and proximate result of the negligent infliction of emotional distress, plaintiffs have suffered embarrassment, humiliation, severe and great emotional pain and suffering, and emotional distress, fear, anger, chagrin, anxiety, and dissatisfaction, all to their general damage in an amount to be proven at time of trial, but in no event less than \$1 million dollars.

WHEREFORE PLAINTIFFS PRAY JUDGMENT AS FOLLOWS:

For plaintiffs first through sixth causes of action, inclusive,

1. For economic and financial losses in an amount to be proven at time of trial, but in no event less than \$2 million dollars;


2. For general damages for emotional pain and suffering and emotional distress in an amount to be proven at time of trial, but in no event less than \$1 million dollars;

3. For costs of suit herein incurred; and

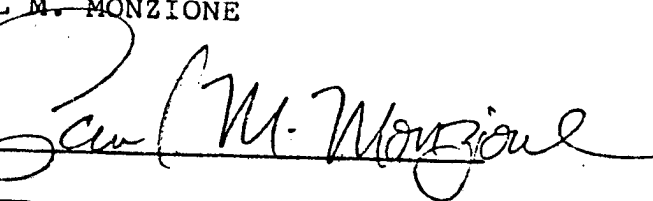
4. For such other and further relief as this court may deem just and proper.

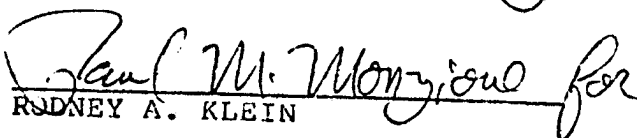
DATED: Honolulu, Hawaii, April 27, 1984.

LAW OFFICES OF ROBERT A. SMITH

By 

MELVIN M. BELLI, SR.
MELVIN CEASAR BELLI, JR.
PAUL M. MONZIO

By: 


RODNEY A. KLEIN

CIV 1 (Rev. 10/82)

SUMMONS IN A CIVIL ACTION

United States District Court	DISTRICT of Hawaii
LOUIS THEODORE FRIGARD and MIRIAM CLAUDIA FRIGARD, Plaintiffs, v. THE UNITED STATES OF AMERICA, (USA), and THE CENTRAL INTELLIGENCE AGENCY, (CIA), a U.S. Governmental Agency, Defendants.	DOCKET NO. TO: (NAME AND ADDRESS OF DEFENDANT) The United States of America, (USA), and The Central Intelligence Agency, (CIA), through their attorney, John Peyton, Assistant U.S. Attorney Honolulu

YOU ARE HEREBY SUMMONED and required to serve upon

PLAINTIFF'S ATTORNEY (NAME AND ADDRESS)

ROBERT A. SMITH, 733 Bishop Street, Suite 2685, Honolulu, Hawaii 96813,
 MELVIN M. BELLI, SR., MELVIN CEASAR BELLI, JR., PAUL M. MONZIONE,
 722 Montgomery Street, San Francisco, California 94111,
 RODNEY A. KLEIN, 2300 Bell Executive Lane, Sacramento, California 95825.

an answer to the complaint which is herewith served upon you, within 60
 days after service of this summons upon you, exclusive of the day of service. If you fail to do so,
 judgment by default will be taken against you for the relief demanded in the complaint.

CLERK

WALTER A.Y.H. CHINN

DATE

(BY) DEPUTY CLERK

(s) Laimoni A. J. Solorzano

APR 27 1984

RETURN OF SERVICE

Service of the Summons and Complaint was made by me ¹	DATE
NAME OF SERVER	TITLE

Check one box below to indicate appropriate method of service

- ☐ Served personally upon the defendant. Place where served _____
- ☐ Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person with whom the summons and complaint were left: _____
- ☐ Other (specify) _____

STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL
--------	----------	-------

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

Signature of Server

Address of Server

Page Denied

Of Counsel:

MELVIN M. BELLI, SR.
 PAUL M. MONZIONE
 Law Offices of Melvin M. Belli, Sr.
 The Belli Building
 722 Montgomery Street
 San Francisco, California 94111
 Telephone (415) 981-1849

RODNEY A. KLEIN, ESQ.
 Law Offices of Rodney A. Klein
 2300 Bell Executive Lane
 Sacramento, California 95825
 Telephone (916) 929-8424

ROBERT A. SMITH 1561
 Attorney at Law, A Law Corporation
 Grosvenor Center, PRI Tower
 733 Bishop Street, Suite 2685
 Honolulu, Hawaii 96813
 Telephone (808) 523-6411

Attorneys for Third-Party Plaintiffs
 Ronald Ray Rewald and Nancy Imp Rewald

UNITED STATES BANKRUPTCY COURT

DISTRICT OF HAWAII

In the Matter of)	BK. NO. 83-00381
)	
BISHOP, BALDWIN, REWALD,)	
DILLINGHAM & WONG, INC., a Hawaii)	
corporation,)	
Debtor.)	
)	
THOMAS E. HAYES, Trustee of)	ADV. NO. 83-0181
Bishop, Baldwin, Rewald,)	
Dillingham & Wong, Inc., and not)	FIRST REQUEST FOR
individually,)	ADMISSIONS TO THE
)	UNITED STATES OF AMERICA
Plaintiff,)	
v.)	
)	
RONALD RAY REWALD, et al.,)	
)	
Defendants.)	

[CERTIFICATE OF SERVICE ATTACHED]

Page Denied

Next 4 Page(s) In Document Denied

Of Counsel:

ROBERT A. SMITH 1561
Attorney at Law
A Law Corporation
Grosvenor Center, PRI Tower
733 Bishop Street, Suite 2685
Honolulu, Hawaii 96813
Telephone (808) 523-6411

Attorney for Plaintiffs

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

FEB 7 1984

at 10:00 o'clock and 00 min. M.
WALTER A. Y. H. CHIN, CLERK

UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

GUNADA GAUTAMA, HENRY)
SUHENDRA and HIDAYAT SINGGIH,)
Individually and on Behalf)
of All Others Similarly)
Situating,)

Plaintiffs,)

v.)

RONALD R. REWALD, RICHARD S.)
SPIKER, and HAWAII NATIONAL)
BANK,)

Defendants.)

CIVIL NO. 83-0848

RONALD R. REWALD,)

Third-Party)
Plaintiff,)

v.)

THE UNITED STATES OF)
AMERICA; JOHN DOES 1-100;)
JANE DOES 1-100; DOE)
PARTNERSHIPS 1-100; DOE)
CORPORATIONS 1-100; DOE)
GOVERNMENTAL ENTITIES 1-100;)
and DOE ENTITIES 1-100,)

Third-Party)
Defendants.)

CIVIL NO. _____

THIRD PARTY COMPLAINT; SUMMONS
ON THIRD PARTY COMPLAINT;
CERTIFICATE OF SERVICE

ATTEST: A True Copy
WALTER A. Y. H. CHIN
Clerk, United States District
Court, District of Hawaii
By John P. Pine Deputy

THIRD PARTY COMPLAINT

THIRD PARTY COMPLAINT

Plaintiffs having filed their second amended complaint on January 23, 1984, and defendant Ronald R. Rewald having timely, within the ten-day period prescribed in Rule 15(a), Federal Rules of Civil Procedure, filed his answer thereto, defendant Ronald R. Rewald, within the ten-day period prescribed in Rule 14(a), Federal Rules of Civil Procedure, herewith files this third party complaint against third party defendants pursuant to the express provisions of 28 U.S.C. §2675(a) and alleges as follows:

A. Background

1. This is a suit against the United States of America and its agents and representatives under the Federal Tort Claims Act, 28 U.S.C. §2671 et seq.; and this Court has jurisdiction pursuant to 28 U.S.C. §1346(b).

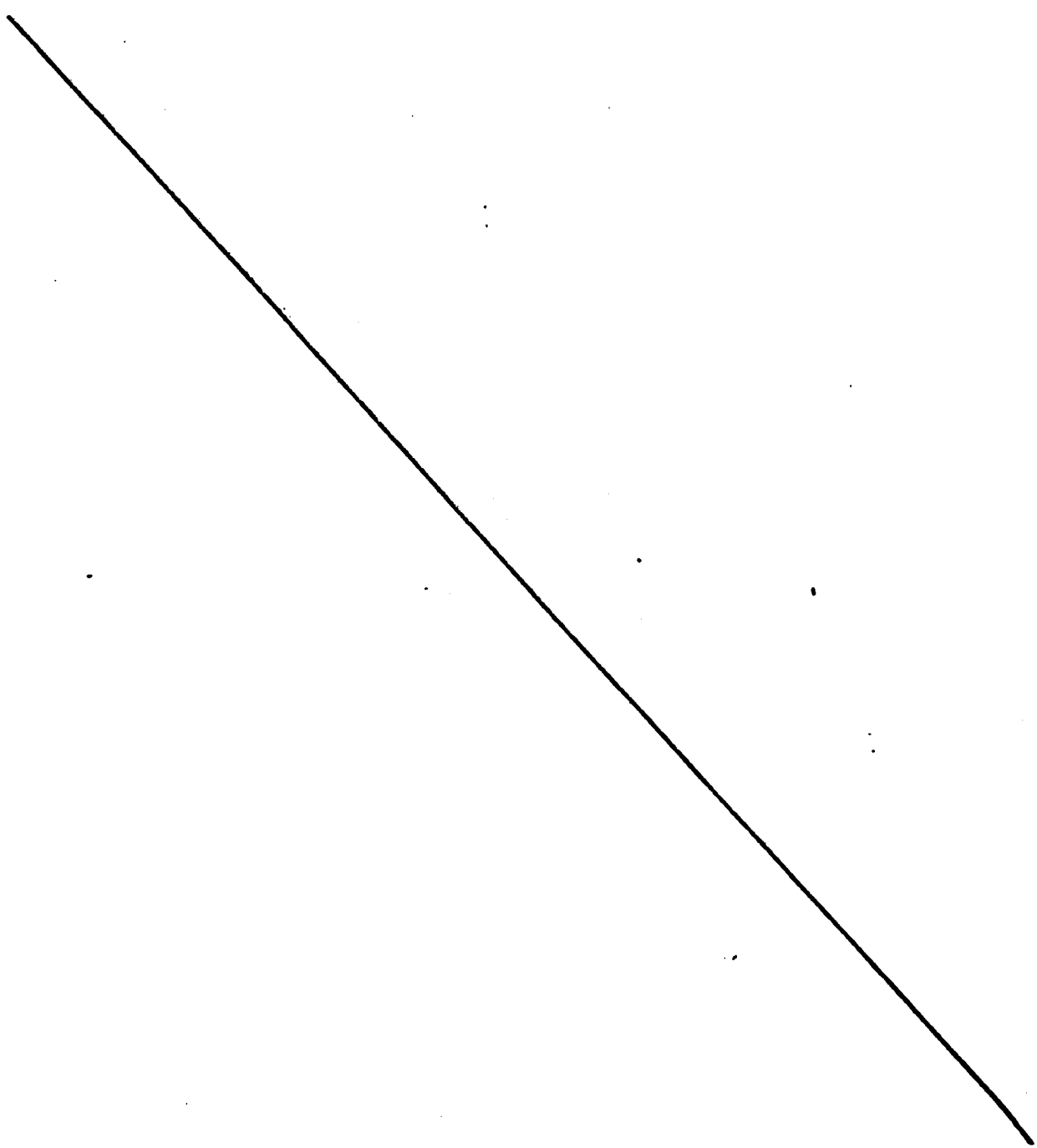
2. Third party plaintiff Ronald R. Rewald ("Rewald") is a Hawaii resident. Plaintiff Bishop, Baldwin, Rewald, Dillingham & Wong, Inc. ("Bishop Baldwin") is a Hawaii corporation of which Rewald was and is chairman of the board of directors. Bishop Baldwin has been adjudicated bankrupt by this Court. Appeal from that adjudication is pending. It is Rewald's intention to bring this action in his own right, and also to assert claims of Bishop Baldwin in a representative capacity, on behalf of all investors, creditors, and employees. Rewald acknowledges that any claims or causes of action which Bishop Baldwin may have against third party

defendant are presently vested in the trustee in bankruptcy. As the trustee has declined to bring this action, Rewald's intention is, concurrently with the filing herewith, to petition the United States Bankruptcy Court for an order requiring the trustee in bankruptcy to abandon Bishop Baldwin's claims and causes of action against defendant in Rewald's favor. If such an order is granted, Rewald will then be able to pursue Bishop Baldwin's claims and causes of action against defendant on behalf of all investors, creditors, and employees of Bishop Baldwin.

3. The Central Intelligence Agency (hereinafter "Agency" or "CIA") is an agency of third party defendant United States of America ("U.S.A.") within the meaning of 28 U.S.C. §2671, for whose tortious conduct or the tortious conduct of its agents and representatives defendant the U.S.A. has liability pursuant to 28 U.S.C. §2674.

4. Third party defendants John Does 1-100; Jane Does 1-100; Doe Partnerships 1-100; Doe Corporations 1-100; Doe Governmental Entities 1-100; and Doe Entities 1-100 are persons or entities who have in some manner or may have in some manner presently unknown to Rewald acted, or failed to act, in a manner so as to bring about the damages and injuries hereinafter alleged, whose names, identities, and capacities are presently unknown to plaintiffs.

5. The factual allegations hereinafter set forth are of facts as reported in the public media or as previously stated publicly by others. As to the truth of those facts, Rewald will submit a sworn statement under seal, as may be required.



Page Denied

Next 7 Page(s) In Document Denied

SCHUTTER PAVEY CAYETANO

LAW CORPORATIONS

May 4, 1984

(b)(3)
(b)(6)

HOWARD GLICKSTEIN

ATTORNEY AT LAW

Honorable William J. Casey, Director
Central Intelligence Agency
Washington, D.C. 20505

Administrative Claim Pursuant to 28 U.S.C. §2675

KAWAIAHAO PLAZA
567 SOUTH KING STREET
SUITE 618
PENTHOUSE/
PARKING ANNEX
HONOLULU
HAWAII 96813
PHONE (808) 524-4600

Dear Mr. Casey:

We represent the claimants listed below, who invested money with the firm of Bishop, Baldwin, Rewald, Dillingham & Wong, 733 Bishop Street, Suite 2600, Honolulu, Hawaii 96813 (hereinafter "Bishop Baldwin"). Bishop Baldwin was a bogus investment consulting firm which accepted claimants' funds for investment and then misappropriated those funds for its own use or for the use of others. Bishop Baldwin collapsed on or about August 1, 1983, resulting in claimants' loss of all funds "invested" with the firm.

We believe that the Central Intelligence Agency either (1) was a joint venturer in the affairs of Bishop Baldwin, (2) assisted Bishop Baldwin in the perpetration of its illegal activities, or (3) was negligent in that the Agency knew, or should have known, of Bishop Baldwin's illegal activities, but nevertheless failed to take any action to warn "investors" or to stop further illegal activities on the part of Bishop Baldwin. We therefore hereby make demand upon the Central Intelligence Agency for the return of all sums invested by our clients with Bishop Baldwin plus payment of all other damages incurred by reason of their investment with Bishop Baldwin.

The names and addresses of claimants and the respective amounts of their claims are as follows:

1.

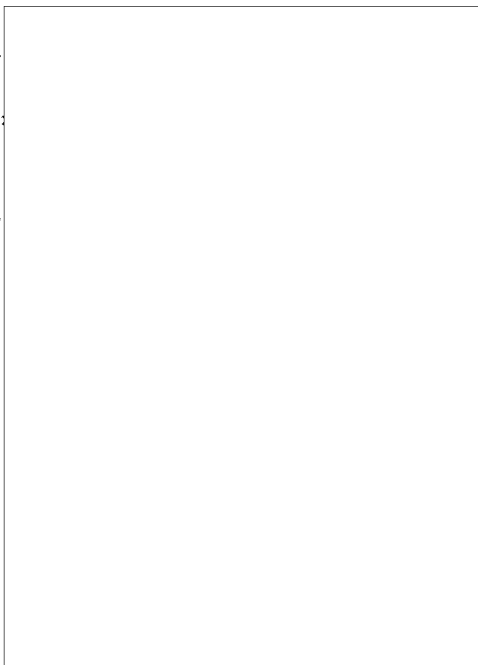
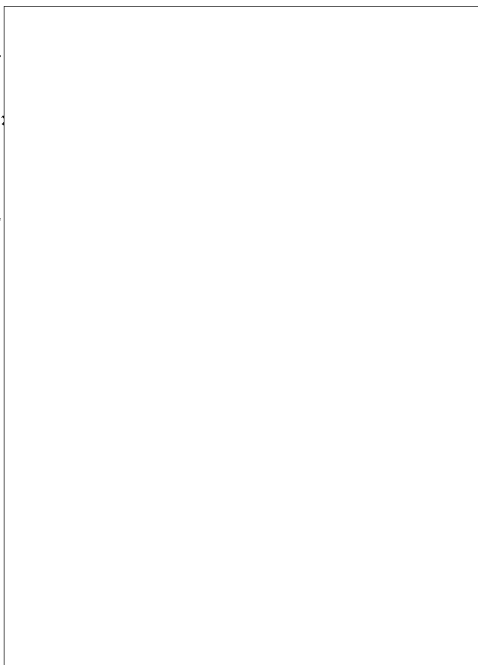
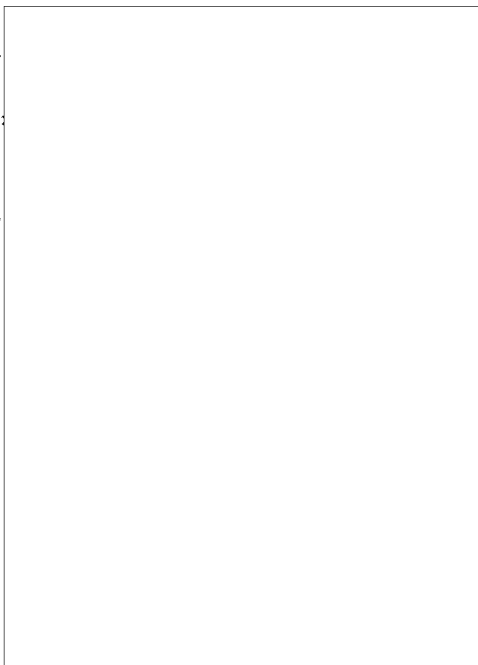
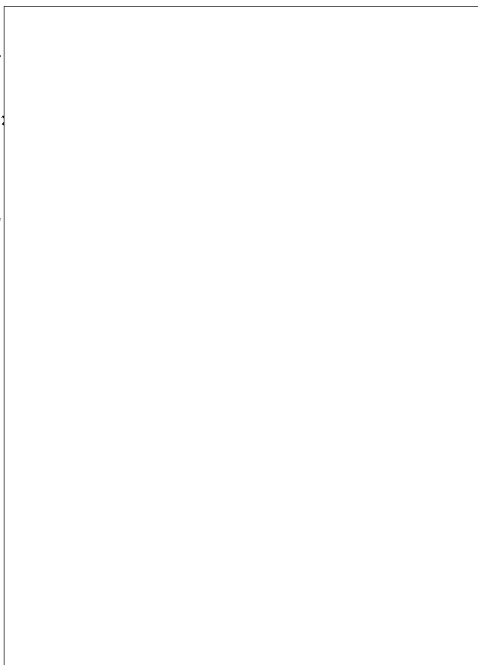

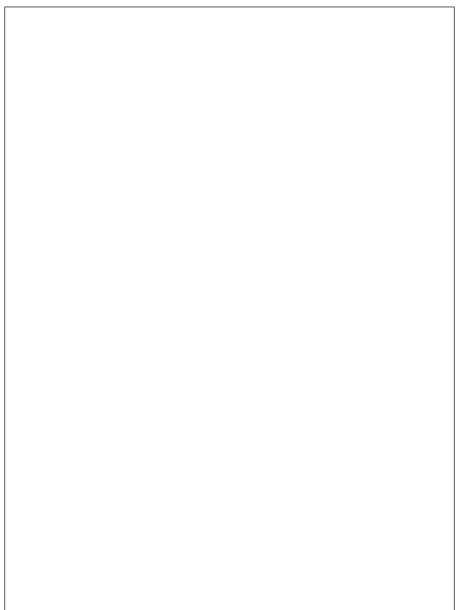
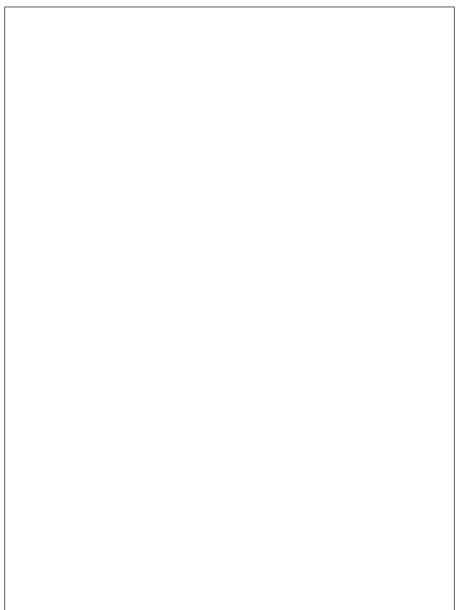
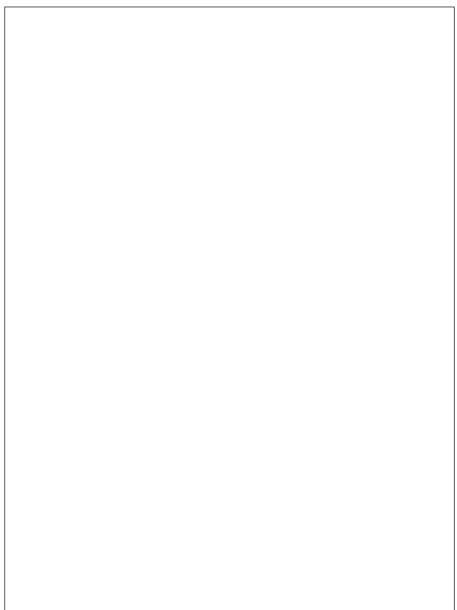
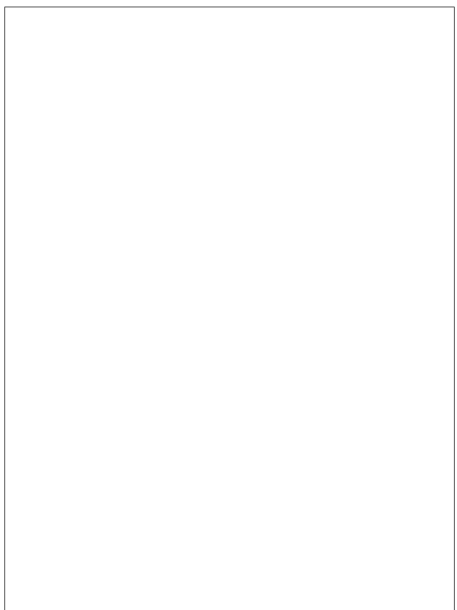
\$5,870,000.00

(b)(3)
(b)(6)

(b)(2)

DAVID C. SCHUTTER
JUDITH ANN PAVEY
BENJAMIN J. CAYETANO

Honorable William J. Casey, Director
May 4, 1984
Page Two

2.		\$1,150,000.00	(b)(6)
3.		\$6,850,000.00	
4.		\$ 303,616.40	
5.		\$1,000,000.00	
6.		\$1,855.247.80	(b)(6)
7.		\$ 905,547.90	(b)(6)
8.		\$1,430,238.00	
9.		\$ 190,000.00	
10.		\$ 250,697.20	

SCHUTTER PAVEY CAYETANO

LAW CORPORATIONS

Honorable William J. Casey, Director

May 4, 1984

Page Three

11. 254,246.60

(b)(6)

12. 314,958.90

13. 100,000.00

14. 61,736.40

15. \$8,000,000.00

(b)(6)

16. 34,382,027.90

17. \$ 512,328.80

18. \$ 800,000.00

19. \$ 150,000.00

SCHUTTER PAVEY CAYETANO

LAW CORPORATIONS

Honorable William J. Casey, Director
May 4, 1984
Page Four

20.		\$ 92,258.20
21.		\$ 744,004.60
22.		\$ 523,561.60
23.		\$15,928,111.40

(b)(6)

Please let me know the Agency's position with respect to these claims at your earliest convenience.

Very truly yours,



Howard Glickstein

HG:jn

CERTIFICATION

I, HOWARD GLICKSTEIN, hereby certify that I am an associate with the law firm of SCHUTTER PAVEY CAYETANO, which has been retained by the above-claimants to pursue claims in connection their investment of funds with Bishop, Baldwin, Rewald, Dillingham & Wong and the subsequent loss thereof.


HOWARD GLICKSTEIN

SCHUTTER PAVEY CAYETANO

LAW CORPORATIONS